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JL4841

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| In re | UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY - TRENTON |
| MARIA E. WARMBOLD, | Chapter 7 |
| Debtor | Case No. 14-13212/CG |
| | Adv. Pro. No. 14-01483/CG |
| TOMLINSON VENTURES, LLC | ANSWER |
| Plaintiff | |
| -vs- | |
| MARIA E WARMBOLD | |
| Defendant | |

The defendant, Maria E. Warmbold, through counsel, the Law Firm of Lavery & Sirkis, by way of answering the Complaint of Tomlinson Ventures, LLC does hereby say:

INTRODUCTION

1. Neither admitted nor denied plaintiff is left to its proofs.
2. Defendant denies the allegations in this paragraph.
3. Defendant denies the allegations in this paragraph.

JURISDICTION AND VENUE

4. Defendant admits the allegations contained in this paragraph.
5. Defendant admits the allegations contained in this paragraph.
6. Defendant admits the allegations contained in this paragraph.
7. Defendant admits the allegations contained in this paragraph.

ALLEGATIONS COMMON TO ALL COUNTS

8. Defendant denies the allegations in this paragraph.
9. Defendant denies the allegations in this paragraph.
10. Defendant denies the allegations in this paragraph.
11. Defendant denies the allegations in this paragraph.
12. Defendant denies the allegations in this paragraph.
13. Neither admitted nor denied plaintiff is left to its proofs.
14. Defendant denies the allegations in this paragraph.
15. Defendant denies the allegations in this paragraph.
16. Defendant denies the allegations in this paragraph.
17. Defendant denies the allegations in this paragraph.
18. Defendant denies the allegations in this paragraph.
19. Defendant denies the allegations in this paragraph.
20. Defendant denies the allegations in this paragraph.
21. Defendant denies the allegations in this paragraph.
22. Neither admitted nor denied plaintiff is left to its proofs.
23. Neither admitted nor denied plaintiff is left to its proofs.
24. Defendant denies the allegations in this paragraph.
25. Neither admitted nor denied plaintiff is left to its proofs.
26. Defendant denies the allegations in this paragraph.
27. Defendant denies the allegations in this paragraph.
28.
 - a. Neither admitted nor denied plaintiff is left to its proofs.
 - b. Defendant denies the allegations in this paragraph.
 - c. Defendant denies the allegations in this paragraph.
 - d. Defendant denies the allegations in this paragraph.
 - e. Defendant denies the allegations in this paragraph.
 - f. Defendant denies the allegations in this paragraph.
29. Defendant denies the allegations in this paragraph.
30. Defendant denies the allegations in this paragraph.
31. Neither admitted nor denied plaintiff is left to its proofs.
32. Neither admitted.
33. Defendant denies the allegations in this paragraph.
34. Defendant denies the allegations in this paragraph.
35. Neither admitted nor denied plaintiff is left to its proofs.
36. Neither admitted nor denied plaintiff is left to its proofs.
37. Defendant denies the allegations in this paragraph.
38. Neither admitted nor denied plaintiff is left to its proofs.
39. Defendant denies the allegations in this paragraph.
40. Defendant denies the allegations in this paragraph.
41. Defendant denies the allegations in this paragraph.

42. Defendant denies the allegations in this paragraph.
43. Neither admitted nor denied plaintiff is left to its proofs.
44. Defendant denies the allegations in this paragraph.
45. Defendant denies the allegations in this paragraph.
46. Defendant denies the allegations in this paragraph.
47. Defendant denies the allegations in this paragraph.
48. Neither admitted nor denied plaintiff is left to its proofs.
49. Defendant denies the allegations in this paragraph.
50. Defendant denies the allegations in this paragraph.
51. Defendant denies the allegations in this paragraph.
52. Defendant denies the allegations in this paragraph.
53. Neither admitted nor denied plaintiff is left to its proofs.
54. Defendant denies the allegations in this paragraph.

FIRST COUNT

OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a) 4(A) AND (B) FOR MAKING A FALSE OATH OR ACCOUNT AND/OR FOR PRESENTING A FALSE CLAIM

55. Neither admitted nor denied plaintiff is left to its proofs.
56. Defendant admits the allegations contained in this paragraph.
57. Defendant admits the allegations contained in this paragraph.
58. Defendant denies the allegations in this paragraph.
59. Neither admitted nor denied plaintiff is left to its proofs.
60. Defendant denies the allegations in this paragraph.
61. Defendant denies the allegations in this paragraph.

SECOND COUNT

OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a)(2) FOR THE TRANSFER AND CONCEALMENT OF PROPERTY WITH INTENT TO DEFRAUD CREDITORS

62. Neither admitted nor denied plaintiff is left to its proofs.
63. Neither admitted nor denied plaintiff is left to its proofs.
64. Defendant denies the allegations in this paragraph.
65. Defendant denies the allegations in this paragraph.

THIRD COUNT

OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a)(3) FOR FAILING TO KEEP OR PRESERVE RECORDS

66. Neither admitted nor denied plaintiff is left to its proofs.
67. Neither admitted nor denied plaintiff is left to its proofs.

68. Defendant denies the allegations in this paragraph.
69. Defendant denies the allegations in this paragraph.

FOURTH COUNT

OBJECTION TO DISCHARGE UNDER 11 U.S.C. § 727(a)(4) FOR WITHHOLDING RECORDS

70. Neither admitted.
71. Defendant denies the allegations in this paragraph.
72. Defendant denies the allegations in this paragraph.
73. Defendant denies the allegations in this paragraph.

Wherefore it is respectfully requested that the Plaintiffs Complaint be dismissed.

June 24, 2014

/s/ Joan Sirkis Lavery
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